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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No. 19-20185

Honorable Terrence G. Berg

-vs-

Violations:

D-1 Ajamion Williams,
D-2 Jovonni Glover,
D-3 Lorenzo McCray,
D-4 Hal Nelson, and
D-5 Ryan Waddy,

18 U.S.C. § 371
18 U.S.C. § 922(j)
18 U.S.C. § 922(g)
18 U.S.C. § 922(n)

Defendants.

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FIRST SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT ONE

18 U.S.C. § 371 – Conspiracy to Receive and Possess Stolen Firearms

D-1 Ajamion Williams
D-2 Jovonni Glover
D-3 Lorenzo McCray
D-4 Hal Nelson
D-5 Ryan Waddy

Beginning on or around October 9, 2018 until on or around October 13, 2018,
in the Eastern District of Michigan, Southern Division, the defendants, AJAMION
WILLIAMS, JOVONNI GLOVER, LORENZO MCCRAY, HAL NELSON,
RYAN WADDY, and others known and unknown to the grand jury, knowingly and

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intentionally conspired and agreed together and with each other to receive and possess stolen firearms, which had been shipped and transported in interstate and foreign commerce, knowing and having reasonable cause to believe the firearms were stolen, in violation of Title 18, United States Code, Section 922(j).

Object of the Conspiracy

The object of the conspiracy was for the defendants to obtain, possess, and sell firearms which had been obtained through theft.

Manner and Means

Among the means by which the defendants carried out the aforesaid conspiracy were the following:

1. Defendants WILLIAMS, GLOVER, MCCRAY, NELSON, and WADDY, along with co-conspirators known and unknown, worked together to force entry into the Firearms Exchange Gun Range on October 10, 2018, after hours.
2. Defendants WILLIAMS, GLOVER, MCCRAY, NELSON, and WADDY, along with co-conspirators known and unknown, stole firearms from the Firearms Exchange Gun Range.
3. Thereafter, defendants WILLIAMS, GLOVER, MCCRAY, NELSON, and WADDY, along with co-conspirators known and unknown, distributed the stolen firearms between themselves.

Overt Acts

In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Eastern District of Michigan:

1. Sometime prior to October 10, 2018, MCCRAY came into possession of a stolen Hummer SUV, knowing or having reasonable cause to believe it was stolen.
2. On or about October 10, 2018, MCCRAY provided the stolen Hummer SUV to other members of the conspiracy, knowing and intending that it be used to effect a break-in at the Firearms Exchange Gun Range on Schoolcraft Road, in Livonia, Michigan. MCCRAY expected to be, and was, compensated by other members of the conspiracy for providing the stolen Hummer.
3. On or about October 10, 2018, in the early morning hours, WILLIAMS, GLOVER, MCCRAY, NELSON, WADDY, and other co-conspirators known and unknown, travelled to the Firearms Exchange in the Hummer SUV and another vehicle, intending to break-in and steal firearms.

4. On or about October 10, 2018, in the early morning hours when the business was closed, WILLIAMS, GLOVER, MCCRAY, NELSON, WADDY, and other co-conspirators known and unknown, rammed the Hummer SUV into the Firearms Exchange Gun Range building, causing significant damage and creating an opening into the building.
5. On or about October 10, 2018, WILLIAMS, GLOVER, MCCRAY, NELSON, WADDY, and other co-conspirators known and unknown removed multiple firearms from within the Firearms Exchange Gun Range building. They abandoned the Hummer SUV in the area and fled in the other vehicle.
6. On or about October 12, 2018, WILLIAMS drove to GLOVER's residence in Hamtramck, Michigan, where he picked up GLOVER. WILLIAMS and GLOVER then drove together to the city of Detroit where GLOVER picked up a duffle bag and placed it in their vehicle. The duffle bag contained four firearms stolen from the Firearms Exchange Gun Range in the above described incident.
7. On or about October 13, 2018, MCCRAY was located sitting in the passenger seat of a vehicle in Detroit, Michigan, in possession of one of the firearms stolen from the Firearms Exchange Gun Range in the above described incident.

8. On or about October 13, 2018, NELSON possessed, at his residence in Detroit, Michigan, one of the firearms stolen from the Firearms Exchange Gun Range in the above described incident.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

18 U.S.C. § 922(j) – Possession of Stolen Firearm

D-1 Ajamion Williams
D-2 Jovonni Glover
D-3 Lorenzo McCray
D-4 Hal Nelson
D-5 Ryan Waddy

Between on or about October 10, 2018 to on or about October 13, 2018, in the Eastern District of Michigan, Southern Division, the defendants, AJAMION WILLIAMS, JOVONNI GLOVER, LORENZO MCCRAY, HAL NELSON, and RYAN WADDY knowingly received and possessed at least one stolen firearm, which had been shipped and transported in interstate and foreign commerce, knowing and having reasonable cause to believe that the firearm was stolen, in violation of Title 18, United States Code, Section 922(j).

COUNT THREE

18 U.S.C. § 922(g)(1) – Possession of a Firearm by a Prohibited Person

D-3 Lorenzo McCray

Between on or about October 10, 2018 to on or about October 13, 2018, in the Eastern District of Michigan, Southern Division, the defendant, LORENZO MCCRAY, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess and receive a firearm, said firearm having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g).

COUNT FOUR

18 U.S.C. § 922(n) – Receipt of Firearm while under Indictment

D-2 Jovonni Glover

Between on or about October 10, 2018 to on or about October 13, 2018, in the Eastern District of Michigan, Southern Division, the defendant, JOVONNI GLOVER, knowing that he was then under indictment for a crime punishable by imprisonment for a term exceeding one year, did willfully receive a firearm, which had previously been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(n).

COUNT FIVE

18 U.S.C. § 922(n) – Receipt of Firearm while under Indictment

D-4 Hal Nelson

Between on or about October 10, 2018 to on or about October 13, 2018, in the Eastern District of Michigan, Southern Division, the defendant, HAL NELSON, knowing he was then under indictment for a crime punishable by imprisonment for a term exceeding one year, did willfully receive a firearm, which had previously been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(n).

FORFEITURE ALLEGATION

(18 U.S.C. § 924(d), 28 U.S.C. § 2461(c))

1. The allegations contained in Counts One through Four of the Indictment are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States code, Section 924(d) together with 28 United States Code, Section 2461(c).

2. As a result of the violations charged in Counts One through Three of the Indictment, the defendants, AJAMION WILLIAMS, JOVONNI GLOVER, LORENZO MCCRAY, HAL NELSON, and RYAN WADDY shall, upon conviction, forfeit to the United States any firearm(s) and ammunition involved in

the offenses, pursuant to Title 18, United States Code, Section 924(d) together with Title 28 United States Code, Section 2461(c).

THIS IS A TRUE BILL

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

MATTHEW SCHNEIDER
United States Attorney

s/Matthew Roth
MATTHEW ROTH
Chief, Major Crimes Unit
Assistant United States Attorney

s/Jihan Williams
JIHAN WILLIAMS
Assistant United States Attorney

s/Andrew R. Picek
ANDREW R. PICEK
Assistant United States Attorney

Date: July 2, 2019